

ORIGINAL
C-T-JIN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISIONFILED
U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FORT WORTH DIVISION
2014 NOV 13 PM 3:44

UNITED STATES OF AMERICA

v.

No. 4:14-CR-071-A

RAMONA JOHNSON (01)

NEKIA N. EVERSON (02)

CLERK OF COURT

GOVERNMENT'S AMENDED WITNESS LIST

<u>No.</u>	<u>Name/Position</u>	<u>Subject Matter of Testimony</u>	<u>Sworn/Testified</u>
1.	Tracy Hojdea Case Agent	Will testify to facts of the case, statements made by defendant Ramona Johnson, search warrant records, provide opinion testimony as to search warrant documents and preparer statistics.	_____/____
2.	Roman Hernandez IRS Representative, or other IRS custodian	Will testify as to tax records, SDC process, and local, state, and national statistics (opinion witness).	_____/____
3.	David McNulty Investigative Analyst, IRS, or other IRS custodian	Will testify as to SDC process (opinion witness).	_____/____
4.	Thomas Hager Criminal Auditor United States Attorney's Office	Will testify as to deposit analysis of voluminous bank records.	_____/____
5.	Laura Perry Special Agent, IRS	Will testify as to undercover operation.	_____/____

<u>No.</u>	<u>Name/Position</u>	<u>Subject Matter of Testimony</u>	<u>Sworn/Testified</u>
6.	Demetria Favors Special Agent, IRS	Will testify as to search warrant records (seizing agent).	____/____
7.	Lisa Niederhaus Special Agent, IRS	Will testify to statements made by defendant Ramona Johnson.	____/____
8.	Gail Cooper Special Agent, IRS	Will testify to statements made by witness Arena Sloan.	____/____
9.	Representative, Tarrant County Clerk's Office	Will testify as to records of business registrations.	____/____
10.	Representative, Secretary of State	Will testify as to records of business registrations.	____/____
11.	Legal Custodian of Records Santa Barbara Bank & Trust	Will testify as to bank records and the tax refund program.	____/____
12.	James Abbott Legal Custodian of Records Refund Advantage	Will testify as to bank records and the tax refund program.	____/____
13.	Kendra Walloch Revenue Agent, IRS	Will testify as to accuracy of tax returns (opinion witness).	____/____
14.	Stephen Bright Client of Tax Office One	Preparation of tax returns	____/____
15.	Pamela Bright Client of Tax Office One	Preparation of tax returns	____/____

<u>No.</u>	<u>Name/Position</u>	<u>Subject Matter of Testimony</u>	<u>Sworn/Testified</u>
16.	Andy Carnes Client of Tax Office One	Preparation of tax returns	____/____
17.	Amanda Carnes Client of Tax Office One	Preparation of tax returns	____/____
18.	Nolan Cornett Client of Tax Office One	Preparation of tax returns	____/____
19.	Angela Cornett Client of Tax Office One	Preparation of tax returns	____/____
20.	Edward Crowder Client of Tax Office One	Preparation of tax returns	____/____
21.	Riska Crowder Client of Tax Office One	Preparation of tax returns	____/____
22.	Craig Dickerson Client of Tax Office One	Preparation of tax returns	____/____
23.	Getonya Dickerson Client of Tax Office One	Preparation of tax returns	____/____
24.	Chance Read Client of Tax Office One	Preparation of tax returns	____/____
25.	Angela Rollins Client of Tax Office One	Preparation of tax returns	____/____
26.	Michael McDonald Client of Tax Office One	Preparation of tax returns	____/____
27.	Natalie McDonald Client of Tax Office One	Preparation of tax returns	____/____

<u>No.</u>	<u>Name/Position</u>	<u>Subject Matter of Testimony</u>	<u>Sworn/Testified</u>
28.	Ronald Trimble Client of Tax Office One	Preparation of tax returns	____/____
29.	Garry Crocker Client of Tax Office One	Preparation of tax returns	____/____
30.	Rebecca Crocker Client of Tax Office One	Preparation of tax returns	____/____
31.	Amiya Willis Client of Tax Office One	Preparation of tax returns	____/____
32.	Joyce Scott Client of Tax Office One	Preparation of tax returns	____/____
33.	Shayonta Blackshire Client of Tax Office One	Preparation of tax returns	____/____
34.	Marjorie Rush Client of Tax Office One	Preparation of tax returns	____/____
35.	Terrance Harris Client of Tax Office One	Preparation of tax returns	____/____
36.	Stephanie Allen Client of Tax Office One	Preparation of tax returns	____/____
37.	Amber Oates Client of Tax Office One	Preparation of tax returns	____/____
38.	Cassey Manning Client of Tax Office One /	Preparation of tax returns and will testify as to being claimed as a false dependent.	____/____
39.	Jackie Branch	Will testify as to being claimed as a false dependent.	____/____

<u>No.</u>	<u>Name/Position</u>	<u>Subject Matter of Testimony</u>	<u>Sworn/Testified</u>
40.	Lakeisha Scott Client of Tax Office One	Preparation of tax returns	_____/____
41.	Custodian of Records, JP Morgan Chase Bank	Will testify as to bank records	_____/____
42.	Custodian of Records, Wells Fargo Bank	Will testify as to bank records	_____/____
43.	Arena Sloan Bookkeeper for Tax Office One	Will testify as to operation and bookkeeping practices of relevant tax preparation offices	_____/____
44.	Josephine Belton Revenue Agent, IRS	Will testify as to audit of taxpayers.	_____/____
45.	Genia Jackson Client of Tax Office One	Preparation of tax returns	_____/____

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<u>No.</u>	<u>Name/Position</u>	<u>Subject Matter of Testimony</u>	<u>Sworn/Testified</u>
46.	Craig Clotfelter Special Agent, IRS	Will testify to Execution of Search Warrant and creation of office layout.	_____/____

Respectfully submitted,

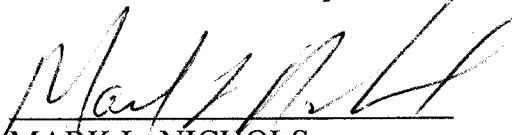
SARAH R. SALDAÑA
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Telephone: 817-252-5253
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CERTIFICATE OF SERVICE

I hereby certify that on November 13, 2014, a true copy of the foregoing Government's Amended Witness List was served by first class mail to John Stickels, counsel for defendant Everson at 770 N. Fielder Road, P.O. Box 121431, Arlington, Texas 76012, and Roderick White, counsel for defendant Johnson at 316 Hemphill Street, Fort Worth, Texas 76104.



MARK L. NICHOLS
Assistant United States Attorney